

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 02-8**

**Respondent:** Peter Shepherd

**Title:** Director

**REQUEST:** AT&T Communications of New England, Set #1

**DATED:** June 24, 2002

**ITEM:** ATT 1-1 This request refers to page 28 of Verizon's Panel Surrebuttal Testimony, the testimony written in response to the question "Please describe AT&T's security procedures."

- a) Please provide all the documentation relied upon for the preparation of the response in Verizon's testimony, including any documentation provided by AT&T to Verizon.
- b) Please identify the person(s) by name and position responsible for providing the information upon which the response is based.
- c) Please identify by address and location within Massachusetts which AT&T facilities are subject to the procedures described in Verizon's testimony. If there are no AT&T facilities in Massachusetts to which the described security procedures apply, please so state.

**REPLY:** a) This testimony was based on actual experiences of Verizon personnel in certain AT&T locations in Massachusetts where Verizon's equipment and facilities reside.

b) The information was provided by the following Verizon employees: Joseph Gallo, Engineer - Network Engineering; Tim Sullivan, Turf Team Leader - Network; Laurel Young, Engineer - Network Engineering; Paul Santaniello, Central Office Supervisor - Network Operations; and Elizabeth Gallien, Central Office Supervisor - Network Operations.

c) While there may be other AT&T locations where such procedures

are used, Verizon MA's testimony refers generally to the

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**REPLY:** ATT 1-1  
(cont'd)

- d) following four Massachusetts locations: (1) 250 Bent St. Cambridge; (2) Waverly St., Framingham; (3) 350 Bridge St., Springfield; and (4) Main St., Worcester. As noted in Verizon MA's testimony, the procedures differ depending on the particular office.

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